



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

SEP - 2 2014

Return Receipt Requested 70110470000291983969

Troy M. Tranquada, Operations Superintendent
ExxonMobil Production Company
CORP-WGR-1006
Houston, TX 77210

RE: Clean Water Act Section 308 Information Request (CWA-308-9-14-001)

Dear Mr. Tranquada:

I am writing today to request information from ExxonMobil Production Company, regarding production operations and related environmental treatment, monitoring and reporting at your offshore oil and gas facilities at Platform Harmony, Heritage and Hondo. The three facilities are currently permitted to discharge wastewater subject to the U.S. Environmental Protection Agency's (EPA's) National Pollutant Discharge Elimination System Permit for Oil and Gas Exploration, Development, and Production Facilities in the Outer Continental Shelf of California (OCS Oil and Gas Permit), under tracking numbers CAF000006, CAF000007 and CAF001302 respectively. This request for information is directed to you, as Operations Superintendent of ExxonMobil Production Company, pursuant to section 308(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318(a), which authorizes the EPA to require persons subject to the Act to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives, and make reports as may be necessary to carry out the objectives of the CWA.

EPA seeks your responses to the questions listed in Attachment 1. Please read the instructions and questions in the attachment carefully before preparing your response. Your response to this Information Request must be postmarked within 30 days of receipt of this letter.

Please include the following certification signed by you, your responsible corporate officer, or duly authorized representative:

I certify under penalty of law that this submission was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those who manage the system or are directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations under the Clean Water Act and 18 U.S.C. § 1001.

Failure to comply with this Information Request can result in enforcement action for appropriate relief and penalties under section 309 of the CWA, 33 U.S.C. § 1319. Compliance with this Information Request does not relieve you of your obligation to comply with the CWA or other applicable laws and permits.

You cannot withhold from EPA what you may consider to be confidential business information. However, you have the discretion to assert, at the time of submission, a claim of business confidentiality for part or all of the requested information by following the requirements at 40 C.F.R. § 2.203(b). EPA will not disclose any information covered by such a claim except as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of business confidentiality is received with your submission, EPA may make the information available to the public without further notice to you. All confidentiality claims are subject to EPA verification.

This Information Request is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is directed to fewer than ten persons and is therefore not a "collection of information" under 44 U.S.C. § 3502(3). It is also an exempt activity under 44 U.S.C. § 3518(c) and 5 C.F.R. § 1320.4.

Please submit your response to:

U.S. Environmental Protection Agency, Region 9
Water Enforcement Section I (ENF-3-1)
Attention: Kristine Karlson
75 Hawthorne Street
San Francisco, CA 94105-3901

Thank you for your cooperation and prompt attention to this matter. If you have questions, please contact Kristine Karlson of my staff at (415) 947-4297 or have your attorney contact Alexa Engelman of the Office of Regional Counsel at (415) 972-3884.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen H. Johnson', written over a horizontal line.

Kathleen H. Johnson, Director,
Enforcement Division

Enclosure: Attachment 1

cc: James Salmons, DoI – BSEE

Under the authority of Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), the United States Environmental Protection Agency, Region 9 (“EPA”) requires ExxonMobil Production Company to provide to EPA the information described below (“Request for Information”).

INSTRUCTIONS

1. Separate Response for Separate Question. Provide a separate narrative answer to, and segregate responsive documents by, each question or its subpart. Precede each answer with the number of the corresponding question or its subpart.
2. Best Information Available. Respond to the best of your ability, even if written documents are not available. Explain any qualified response. If you do not have the responsive information but know the person from whom the information may be obtained, identify the person.
3. Document Submission. Whenever requested to provide documents, provide copies of all responsive documents in your possession, custody or control. If a responsive document was, but no longer is, in your possession, custody or control, explain what was done with it. If another person has possession, custody or control of the document, identify the person. If the document was disposed of, explain when and why it was disposed of and who disposed of it.
4. Use of Document in Place of Answer. If a document provides the complete answer to a question, you may use it in place of a written answer by supplying the document and appropriately identifying the applicable portion of the document as answering a specific numbered question.
5. Identification of a Person. Whenever requested to identify a person, state:
 - a. as to an individual: the individual’s full name, title, contact information, and last known employer;
 - b. as to a corporation: its full name and contact information; and
 - c. as to a person other than an individual or a corporation: its official name, organizational form, and contact information.
6. Document Alteration or Deletion. Explain the reason and identify the person responsible for any deleted, altered or redacted portion of a submitted document.
7. Obligation to Correct. If you later discover that any submitted information is incorrect, submit a corrected response as soon as possible.
8. No Effect on Other Legal Obligations. This information request in no way alters or relieves you of other legal responsibilities or restrictions imposed on operations at the Site at the federal, state or local government level.

DEFINITIONS

The following terms shall have the following definitions for this Information Request:

1. "Document" means all written, recorded, computer generated, or visually or aurally reproduced materials of any kind in any medium in your possession, custody or control or known by you to exist, including all originals, drafts and non-identical copies. The term includes, without limitation, all reports, studies, surveys, plans, transcripts, permits, licenses, deeds, maps, drawings, schematics, specifications, instructions, calculations, monitoring data, rental records, contracts, agreements, bid documents, purchase orders, work orders, invoices, payment records, spreadsheets, communication records, correspondence, notes, memoranda, photographs, and videos.
2. "Person" means any entity, however denominated. The term includes, without limitation, any individual, firm, corporation, governmental entity, partnership, association, sole proprietorship, trust estate, board, and committee.
3. "Site(s)" means the applicable oil and gas production platform(s) operated by ExxonMobil Production Company, located in the Pacific Outer Continental Shelf off the coast of California. The Sites subject to this information request are Platforms Harmony, Heritage and Hondo, which operate subject to the OCS Oil and Gas Permit under tracking numbers CAF000006, CAF000007 and CAF001302, respectively.
4. "Site Condition" means any physical feature of the area in question, including, but not limited to, the condition of pipes, valves, meters, etc., used to collect, convey, treat or process oil and gas.
5. "You" means ExxonMobil Production Company.

INFORMATION REQUEST

1. Describe the wastewater treatment and conveyance system for produced water at each Site, and provide for each Site a separate schematic of its wastewater conveyance and treatment system depicting and labelling all major components, beginning with the point at which wastewater is produced, continuing through each unit of the treatment train, and ending with the final discharge point.
Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo

2. Describe the regimen for monitoring, sample analysis, and reporting of oil and grease amounts in produced water discharges. Include the following information: frequency of monitoring, type of sample taken, specific analytical method used (including the applicable citation to EPA approved methods), and reporting practices. Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo
3. Identify whether the monitoring schedule for each type of sampling and analysis is predetermined and unchanging or is flexible. If certain types of sampling and analysis are conducted on a flexible schedule, or if the frequency changes from a set schedule, describe the rationale for those changes. Provide any and all written documents memorializing your monitoring schedule, sample collection, sample analysis, and reporting practices. Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo
4. Describe your methods for, and frequency of, monitoring and reporting for oil sheens or plumes. Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo
5. Identify and describe the conditions under which oil sheens and plumes are reported to the EPA. If you have a written policy in place for determining whether an oil sheen/plume must be reported to the EPA, provide any and all documentation of your policy. If oil sheens/plumes are reported to other agencies but not the EPA, provide the rationale for this practice, and provide documentation of any and all oil sheens and plumes that were reported to other agencies (e.g. the U.S. Coast Guard and/or the Department of Interior), but not to EPA since October 1, 2009. Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo
6. Describe any and all monitoring, sampling and analysis you conduct outside of the EPA approved methods to measure oil and grease in produced water discharges. Provide documentation of the results of all such monitoring (dates, locations, pollutant parameters, measured levels, units and related information) conducted during the one-year period immediately prior to receipt of this information request. Provide this for:
 - a. Platform Harmony
 - b. Platform Heritage, and
 - c. Platform Hondo

